

West Virginia Executive Branch Privacy Policy: Security Safeguards

Handling Sensitive PI

Question:

What makes some personal information sensitive?

Answer:

We all recognize that some types of personal information (PI) are more sensitive than others. We are usually willing to give our office phone number to people, but we would not give our Social Security number to someone without a good reason.

The West Virginia Executive Branch Security Safeguards Policy requires each Department to protect PI, taking into account its sensitivity. This means that Departments are expected to have strict procedures to protect the most sensitive PI, while more flexibility can be offered for less sensitive PI. For example:

- ✓ All Department workers may have access to the employee directory, containing co-worker names, office locations and office phone numbers. This PI isn't sensitive and broad access enables us to locate and call coworkers as needed.
- ✓ A database containing employee medical records would only be accessible by a small number of HR workers who need the information to process leave requests. Health information is very sensitive, so access is limited to people who have a need-to-know.

Everyone should be familiar with the types of PI that are considered sensitive. Here are some examples of sensitive PI:

- Social Security numbers and other government-issued identification numbers, such as driver's license numbers,
- Financial account and payment card information (such as credit card numbers),
- All health-related information, medical records, and biometric data (*e.g.*, fingerprints),
- PI contained in personnel records,
- All records pertaining to recipients of state benefits, such as foster care, welfare, food assistance programs, protective services, *etc.*,
- Information used to access computer systems (such as login names and passwords),
- Law enforcement records/files containing PI,
- Information from consumer reports, such as employee background screening reports, or reports from third party investigators, and
- Records containing information that individuals generally consider sensitive, such as race, religion, national origin, sexual orientation, and political affiliation.

If you handle sensitive PI as part of your job, be sure that you understand the security and confidentiality processes that apply. Even if you don't routinely handle sensitive PI, be aware that you likely still have access to lots of sensitive PI. For example, you may know your coworkers' health information, sexual orientation, or religion. Before you use or share any sensitive PI, consider whether that use or disclosure is appropriate and consistent with your obligations under the WV Executive Branch Privacy Policies. If you aren't sure, ask your manager or your Privacy Officer!